

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

THE MUNICIPALITY OF SAN JUAN

Plaintiff

v.

EXXON MOBIL CORP. et al.,

Defendants

CIVIL NO.: 23-cv-01608-ADC

**INFORMATIVE MOTION SUBMITTING RELATED
REPORT AND RECOMMENDATION**

TO THE HONORABLE COURT:

Plaintiff Municipality of San Juan, through its undersigned counsel, very respectfully states and prays as follows:

1. As this Honorable Court has been made aware, there is a companion case to this one of the Municipality of San Juan, that of the Municipalities of Bayamón, et als vs. Exxon Mobil Corp., et als., Civil Number 22-1550 (SCC) (HRV).
2. This court has correctly entertained in the past the convenience of consolidating both cases, see Dockets 64 and 65, in order to avoid contradictory rulings and to preserve the resources of the courts.
3. The motion practice by the defendants in both cases are practically mirrored to each other, filing the initial ones in the older case and subsequent ones in this one. Likewise, much of the responses to the motions in our case here are similar to the ones in the earlier filed case.

4. Judge Carreño, as presiding judge in the initial case, assigned to a U.S. Magistrate Judge for a report and recommendation pending dispositive motions. Enclosed is the 93-page Report and Recommendation, product of the Docket Entry 315 produced by Magistrate Judge Ramos a month ago today.
5. Those dispositive motions reviewed and ruled upon by the Magistrate Judge in the initial case mirror the ones pending before this Honorable Court.
6. This action further strengthens this Court's concern raised at Docket Entry 64.

WHEREFORE, Plaintiff Municipality of San Juan respectfully requests of this Honorable Court that it take notice of what is herein submitted in the best interest of procedural justice.

I HEREBY CERTIFY that on this same date, I electronically filed the foregoing using the CM/ECF System which will send notification of such filing to all attorneys of record.

In San Juan, Puerto Rico, this 20th day of March, 2025.

Respectfully submitted,

s/ David Efron
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